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VIA EMAIL

Comments on Proposed Program of Work for Inyo National Forest Recreation Facility
Analysis dated November 16, 2007v2

Dear Jeff,

Thank you for this opportunity to comment on the Proposed Program of Work for the Inyo National Forest's Recreation Facility Analysis (RFA). With over 3.5 million visitor days per year, this land where the desert meets the mountains managed as the Inyo National Forest (Inyo) boasts the highest visitation of any Forest in California. Within Forest Boundaries, the highest peak in the Lower 48, America's largest desert mountain range, the world's oldest tree, the world's largest monospecific Jeffrey Pine forest, and hundreds of other natural wonders – make the Inyo, literally, California's backyard of choice.

The sheer magnitude of recreation occurring here underscores the importance of the RFA on the Inyo. It is our belief that this process can be the first step toward creating a more comprehensive management vision that will result in sustaining multiple forms of recreation while improving the health of the land and the individual visitor experience.

The lands of the Inyo have the ability to effect, renew and teach. The sundry facilities – from minor interpretive installations to campgrounds to major visitor centers – are the windows through which the general public will largely experience the Forest. The messages these facilities send – both overt, in the case of interpretation – and subtle, as in the physical state of a campground and the surrounding forest – reflect not just on the Forest Service as a public trust land management agency, but also directly shape the interaction of the public with their national forest heritage.

Given the importance of such facilities, we hold out great hope that this RFA process may signal the beginning of a reinvestment in helping Inyo visitors see the Forest for the trees (or peaks, ridges, creeks, chickadees, etc.).

The following comments are organized by headings in the RFA document dated November 15, 2007v2.

B. Forest Recreation Niche

Immediate Need for Portal Signage and a Modest Proposal for Short-Term Achievement - Under the heading, **Programmatic Strategies**, the document calls for the “Development of a comprehensive I(nterpretation) & E(ducation) strategy for the forest that focuses on new visitors.” We could not agree more that a comprehensive strategy to tell the stories of these lands and ensure proper land use through education should be a top priority in the coming year. Given the importance of interpretation and education when attempting to manage growing recreational use with stable or declining capacity, we believe improving the signage on the Forest is an immediate priority. An improved signage program need not be an onerous task and is too important to wait for a completely vetted, comprehensive strategy.

Currently, Forest information is available in a few limited areas – developed visitor’s centers and some interpretive sites, such as South Tufa or Minaret Vista. We believe that these developed areas only capture a small amount of the visitor’s coming to the Inyo. This is especially true of return visitors or those visitors seeking to recreate “off the beaten path.”

To ensure natural history, cultural history, regulatory information and basic best practices (i.e. Leave No Trace, Tread Lightly) reach the majority of users, Friends of the Inyo would like to propose a “Forest Portal Project.” Under this program, new interpretive signs, with place-specific natural and cultural history information, regulatory information and a map of roads, trails, facilities and other opportunities be immediately placed at each major Forest portal off of Highways 395, 168, 120, 6 and 158 (June Lake Loop), as well as the off the Big Pine-Eureka Road (for the Inyo Mountains) and the Benton Crossing Road (for Casa Diablo and the Glass Mountains).

A cursory review of the Inyo National Forest Map turns up 27 different portal entrances – junctions such as the Junction of 395 and the Obsidian Dome Road and Bald Mountain Road, 120 with the Sagehen Summit Road (FS 1N02) and Highway 168 with the White Mountain Road that could be candidates for signing. Illustrative of the need and simplicity of this project is that many of these junctions currently have an empty Forest Service Kiosk sign board!

With an investment of less than \$200 per empty sign board, these portals would add life, site-specific stories, and regulatory information that is currently lacking across the Inyo.

We offer to design the content of these signs in conjunction with Forest staff and other partners, as well as work to install them over the coming Spring. Samples of signs we have already developed and installed on local BLM lands are readily available.

With cooperation, the Inyo National Forest could have interpretive and regulatory signage at every major portal by the beginning of the 2008 Summer season.

Desire to expand current non-motorized trail network to spread use across the Forest – Under **Programmatic Strategies**, the document states the desire to “provide loop opportunities...for SUVs.” While we believe the loop concept is a sound, cost-

effective strategy for managing and facilitating motorized use of the Forest, we feel there is also a need to develop more non-motorized recreational opportunities in the “frontcountry” (e.g. lands east of the Sierra Escarpment).

We believe trail construction in areas currently lacking developed opportunities, such as along the Upper Owens River, the Glass Mountains, Mono Basin, Coyote Plateau, the Southern White Mountains, Casa Diablo and the Jeffrey Pine Forest will not only introduce visitor’s to little-known, but outstanding natural wonders here on the Forest, but also alleviate the overcrowding at popular trailheads and attractions such as Rock Creek, Bishop Creek and the Earthquake Fault.

A potential start to getting more people out on the land could involve the enhancement of the current 395 Eastern Sierra Scenic Byway pullouts with easy, one to two mile interpretive trails.

Across the Forest there are dozens of use trails and overgrown routes outside of heavily impacted areas that could easily be converted to enjoyable trails at minimal cost.

F. PROPOSED MANGEMENT ACTION SUMMARY item 3 – Recreation Sites Priority Ranking Report

In this comprehensive section, we note the possible absence of a few developed facilities:

1. **Convict Lake Accessible Fishing Platform** – Constructed in 2006 with volunteer labor under the guidance of Friends of the Inyo, this fishing platform is situated on the eastern shore of Convict Lake.
2. **White Mountains Ancient Bristlecone Pine Forest Entrance Station** – While it has been standing vacant for the past few years, this Entrance station could become a wonderful, unstaffed or occasionally volunteer staffed entrance Kiosk to the White Mountains, America’s largest desert mountain range.
3. **Tollhouse Spring Interpretive Area** – Situated on Highway 168, Westgard Pass, this pull-out until recently featured a very interesting interpretive display on the history of Westgard Pass. It is also a wonderful example of a desert oasis that draws many birders and butterflyers. Interpretive facilities at this site should be improved, and Friends of the Inyo will volunteer to help in design and placement of such improvements.
4. **Pinyon Nature Trail** – This short trail with interpretive signage may be the “Pinyon Picnic Area” listed, but we are unsure. This great trail would benefit from improved signage noting its existence and improved interpretive signing.

A. SITE-SPECIFIC TASKS

Following is a list of comments for particular sites.

Overall note on all Campgrounds – There is currently little to no interpretive signage in the Inyo’s Campground. These developed sites are a perfect place to capture the visitor’s attention, tell the story of the surrounding landscape and give a soft regulatory message.

We strongly believe creation of a site-specific display for each campground should be a priority and offer our help in design and placement.

Aspen Campground – We wholeheartly support the improvement of this and other campgrounds in the Lee Vining Canyon area. It is well known that this entire canyon could use some overall recreational planning, but we are most supportive of the direction the Forest appears to be taking by moving to place this and other campgrounds under their REA authority. We believe forest campgrounds are best managed by the Forest Service and public personnel. Not only do funds generated come back directly to the Forest, but the impact on Forest visitors of “seeing the green” of Forest trucks and uniforms is critical to the Forest’s organizational future and strengthens the Forest’s role as active manager of these Forest lands. Wherever possible, Friends of the Inyo supports bringing current concessionaire run campgrounds back into Forest hands.

Bald Mountain Cabin – We fully support the improvement and possible conversion of this facility to a rentable hut such as those found on the El Dorado NF for revenue generation and a new recreational opportunity.

Bennetville Interp site – This well used facility needs better signage at the beginning of the two entrance trails. As with all interp improvements, we offer our help. Signage should not be placed at the cabin to maintain the wild nature of the place.

Big Springs CG – The current chainlink fence dividing the campground from the Spring should be replaced with a Jeffrey Pine post & beam fence and the current loop just above the fence revegetated to curtail the ongoing erosion of the cut-slope above the Spring. Big Springs is an amazing resource that is currently under-interpreted. The lack of a defined trail to the Spring, itself, has lead to a proliferation of short-user trails; one trail should be improved and the others revegetated. FOI would love to take this project on as one of our annual Protect Our Headwaters Day events occurring the second weekend of July each year.

Glass Creek CG & Hartley GC– As with many of the campgrounds in the Mammoth-June area, Glass Creek, Hartley and Big Springs CGs are becoming defacto staging areas for OHV users. This shift is driving out non-motorized users from many of the campgrounds in this area.

Improved signage is needed here, but more importantly some simple recreational design measures could be implemented to lessen the route proliferation and resource damage occurring here. In this and Hartley Campground, OHV users have created numerous routes in and out of the campground – one route in and one out should be designated, with all proliferated routes restored. The proliferation around Glass Creek CG is particularly marked and getting worse. Also, it is difficult to tell where one campsite ends and another begins as users have eradicated vegetation that traditionally marked sites. Parking areas and individual sites need to be delineated with hard barriers – either raised bollards or large boulders – to ensure some native vegetation remains in the campgrounds.

A special fee for campers with OHVs should be strongly considered and implemented across the Inyo to fund the needed management, maintenance and enforcement necessitated by intensive OHV use.

Mono Mills Interp Site – This new site provides the perfect opportunity to create a gentle 1-2 mile loop trail to interpret the Jeffrey Pine forest and its ecology. FOI has offered and continues to be interested in being the lead on such a trail.

Panum Crater – This popular site sorely needs trail delineation and regular maintenance. We would gladly coordinate ongoing maintenance here once a trail system is decided upon.

Tioga Lake CG – The American Alpine Club has expressed a willingness to get involved keeping this campground open longer as it is one of the few places to legally camp near Tuolumne Meadows and Tioga Pass.

Upper Deadman CG – In years of average and above flow, some sites in this campground flood. Revegetation of sites along the creek may decrease the flooding by encouraging the reoccupation of the creek's historic channel.

Warren Fork TH CG – This little known spot is very lightly developed. Before moving to a full fee for this site, we support the placement of an Iron Ranger for donations at the beginning of the campground area. This could easily be done soon, and could gauge use, as well as the potential effectiveness of fee collection at this site.

Duck Pass TH – Trash collection is a huge problem in the Lake Basin. Removal of the trash cans at this popular trailhead will only increase the current trash problem. Before any cans are removed there must be an alternative plan. Perhaps trash collection at this trailhead could be added to the contract of the concessionaire at the popular Coldwater Campground.

Hot Creek Interpretive Site – An Iron Ranger should be installed here to gauge the public's reaction to fee collection and start a fund to improve this location. Regularly scheduled interpretive programs would be a wonderful addition to this location.

Inyo Craters Interp Site – Trail delineation is sorely needed here. A trail should be created around the main crater – there is already a proliferation of use trails around the crater. One trail would concentrate and define this use. Friends of the Inyo would be more than willing to work on improvements at this site, as well.

Minaret Vista – This site definitely needs improvement in terms of trail delineation and improved signage. This would be a great partnership project utilizing NFF resort funding from MMSA. As one of the lowest points along the entire Sierra Crest, this interpretive potential at this site is great.

Grandview Campground – This is one of the most spectacular campgrounds in the FS system. Has the Forest considered a Volunteer host for this site?

Poleta Canyon OHV Day Use – We fully support removing this attractive nuisance. The entire Open Area should be reverted to designated routes only, as the presence of a poorly defined open area creates the perception that open riding is the acceptable norm for some riders. This would make a good volunteer project.

Oak Creek CG – Is this campground closed for good or will it be rebuilt?

B. PROGRAMMATIC ACTIONS

Interpretive Signage in each Campground – As part of the “Camping Strategy” we strongly support adding an interpretive/regulatory signage component that would place signs such as those described above in the Forest Portal Project to each campground with site-specific content.

The camping strategy should also take into account the growing problem of user displacement as campgrounds become defacto OHV staging areas, as well as how to manage and redesign campgrounds to minimize surrounding resource damage and route proliferation, including but not limited to an active user education program.

We also support the creation of more walk in campgrounds, as well as campground redesigns which separate RV users from more traditional, quiet campers.

Install Iron Rangers today before considering fees for tomorrow – Iron Rangers should be installed at popular trailheads this coming season ahead of SRP or SA fee collection approval.

Forest Portal Project – As outlined above, there is an immediate and pressing need for improved signage and messaging around the Forest. We believe a Forest-wide signage and interpretation program should be included as one of the Programmatic Actions. While a more complete program is being developed, a Portal Project could be started as soon as possible. Early implementation could provide feedback for the final product, while helping visitors see the Forest for the trees.

Again, thank you for this opportunity to comment on this important process. Please do not hesitate to contact me to take us up on our many offers of assistance provided in this document.

Respectfully,

Paul McFarland
Executive Director